

## **Exhibit M**

**Ayodeji Odulaka**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
AYODEJI ODULAJA**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
COUNTY OF GLOUCESTER ) : SS.:

AYODEJI ODULAJA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1132 Monet Court, Williamstown New Jersey 08094.

2. I am currently 33 years old, having been born on April 28, 1989.

3. I am the son of Joshua Olojo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic leiomyosarcoma on November 7, 2016, at age 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I had a close relationship. We would often go to soccer games and loved to play soccer at home. He took me to school and guided me in my schoolwork. We played games at home and spent a lot of time together. As I got older, my father helped me with SAT prep and high school classes. He was there for my senior prom and other milestones in my youth. He moved me into my college dorm and was a source of support for me in college. He

gave me guidance on school and in my career, and he taught me how to plan for the future.

6. When the September 11<sup>th</sup> attacks occurred, my father was in a nearby building. I was a young kid, so I don't remember much about what happened. I recall that he came home a few days later covered in dust, asbestos, and debris. After 9/11, my father continued to work in the downtown Manhattan area, near Ground Zero, for another 3-4 years before he was diagnosed with cancer.

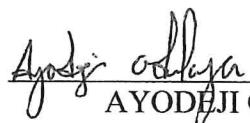
7. The first time my dad fell sick, sometime in 2015, we called an ambulance to rush him to the hospital. I was pretty scared, because my dad was a really healthy guy who never got sick. So, for him to be rushed to the hospital and have to stay overnight, I knew it had to be serious. I was in the hospital room with my mom when they told her that my dad had cancer. The doctors said my father would need two surgeries.

8. During the first surgery, they thought they got out all the brain cancer. So, he went into remission for a while. But the cancer came back, and he needed a second surgery. For several years, my dad did chemotherapy as well. He had several rounds of chemo, and I went along with him to all his appointments. He couldn't drive because he was so weak. My dad's appointments were at Fox Chase Cancer Center in Philadelphia, so I would drive him there from our home in New Jersey.

9. For me, his diagnosis shook me a little. I was always thinking about my father, and it was hard for me to focus on school like I had been. I was studying biology at Penn State University at the time, but I took time off and moved back to New Jersey to care for my father. I took about four years off of college. Returning to college after my dad's death was very difficult. My father would have paid my tuition, but after his death I had to take out loans. I'm still paying off \$100,000 worth of loans. I had to get a job to support my mom, to pay her mortgage and bills. It's a lot of stress on me and our family.

10. My dad had a neurosarcoma which spread to his brain and impacted some of his organs. My dad couldn't breathe on his own. He would have buildup of fluid in his esophagus. Watching my dad suffer would drive me to tears at time—both seeing my father's cancer progress and the side effects of the chemotherapy. I try not to think too much about it, and I want to live my life in honor of him.

11. My dad was an upbeat man, and I know for a fact that 9/11 affected him physically and emotionally. My dad had to watch his coworkers die of 9/11-related illnesses before he did, and I know that affected him. Witnessing the decline of his health really impacted me and my family. Going to the hospital every day and having to sacrifice my education—it took a toll on me. It took a toll on my mother too, who had to work to support her dying husband. Coordinating his care over those years was very difficult. It was traumatizing to see my father in so much pain; I still remember his facial expressions when the fluid built up in his lungs. It saddened me knowing that I couldn't help him. I really love my dad. I wish he was still here. I recently got married, and I wish my father was there to walk me down the aisle.

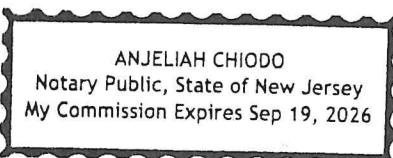


\_\_\_\_\_  
AYODEJI ODULAJA

Sworn to before me this  
15 day of July, 2022



\_\_\_\_\_  
Notary Public



**Abiola Olojo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
ABIOLA OLOJO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY )  
                          :  
COUNTY OF GLOUCESTER ) : SS.:

ABIOLA OLOJO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1132 Monet Court, Williamstown, New Jersey 08094.
2. I am currently 59 years old, having been born on April 24, 1963.
3. I am the wife of Joshua Olojo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My husband passed away from metastatic leiomyosarcoma on November 7, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. Joshua was a very loving husband and a good father. He was always there to help his family. He took care of our needs, our home, our children's education, and he always paid our bills and for our groceries. He truly valued education. When our kids went back to school, he would buy any school supplies they needed to succeed. He didn't want our children to slack off in school. He wanted to make sure his children grew up in a good home. He would take our

kids on nice vacations and to nice restaurants, because he wanted to teach our children to aspire to success in life. During the holidays, he bought new clothes for me and our kids. There are so many great things I could say about Joshua. He had an uncommon sense of character. I don't think I truly appreciated it until he passed. He would talk to our kids 5-6 times each day on the phone, and he would have all their school calendars. He was just a great, fun guy. He was a genius, and a loving person.

6. Before 9/11/2001, my husband was an accountant with the New York State Tax and Finance Department. He worked on the 87<sup>th</sup> Floor of the South Tower of the World Trade Center. Normally, Joshua was always on time to work. The Sunday before 9/11, Joshua was injured in our church's soccer league. So, he was late to work that day. That was his saving grace. When I realized that a hijacked plane hit the World Trade Center, I thought, "Oh my God, that's where my husband works." Before I knew it, the South Tower was hit. I thought, "There's no way he's not there right now." But as God would have it, he had just gotten into the building and security asked him not to get in the elevator. As he evacuated the building, the dust engulfed him. He fell three or four times before taking shelter in a pizza place. After 9/11, Joshua's office was moved to Broad Street.

7. The NYS Tax and Finance Department told us to see a doctor, because Joshua had inhaled so much smoke. The doctors at first told him he was alright but that they would continue to monitor him because he had inhaled so much smoke. He went regularly to his appointments. Over time, the particles he had inhaled were destroying his lungs little by little. He had many cysts in his lungs, which resulted in cancer. The doctors advised him to start radiation. After radiation, he had two surgeries to remove the larger cysts. He also had chemotherapy, which he did for years. Joshua was in different clinical trials for the chemotherapy, but the cancer was multiplying and growing faster than the doctors could treat it.

8. Over time, Joshua's cancer spread to his kidney and his brain. I asked him to stop working, because he was clearly in a lot of pain and very stressed. We had four kids, so I had to start working again. I needed to keep the children going. I couldn't work as much as Joshua used to, so our income was less than it used to be. We had to ask some of the children to withdraw from college. It was really a terrible time for the family.

9. The emotional impact of Joshua's illness and passing on my life was immense. It was such a terrible thing; I really can't quantify it. It's the worst thing I've ever experienced. Watching my husband deteriorating and knowing what a strong person he was. Watching all his flesh fading away, his hair falling off, it was horrible. He was uncomfortable about his appearance, and people made him feel self-conscious. Our children were sitting at home worrying about their father, and he didn't want the kids to lose focus from their education. He didn't want to weigh our children down with the burden of his sickness. I had to juggle taking care of my husband, taking care of my children, and going back to work.

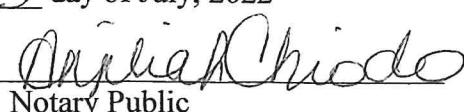
10. I had to carry the whole burden by myself. There were times where I thought I wasn't going to make it, where I thought I was losing my mind. I begged him to talk to the pastor. He said, "I am praying, so don't worry about it." It was tough. I had to ask my children to stop school, which I didn't want to do. Some children I asked to go to community college, so they could work to earn extra money for the family. I had to pick up extra shifts, which was very stressful. After Joshua died, we lost our house, which was unbearable. I had so much shame—where was I going to put my children? All the kids didn't want to go back to school, they lost motivation in life. They were extremely depressed. Adedapo stayed in bed for two years. But I couldn't be weak, I couldn't mourn. I had to carry my family.

11. I just wanted my children to get up and continue through life. When the children went back to school, they had to take out loans and financial aid. So now, my children are burdened with loans. It wasn't easy for my kids to get scholarships either. We all suffered greatly from the loss of my husband.



ABIOLA OLOJO

Sworn to before me this  
15 day of July, 2022



ANJELIAH CHIODO  
Notary Public

ANJELIAH CHIODO  
Notary Public, State of New Jersey  
My Commission Expires Sep 19, 2026

**Abisola Olojo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
ABISOLA OLOJO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF MARYLAND )  
: SS.:  
COUNTY OF PRINCE GEORGE'S )

ABISOLA OLOJO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3 Vermella Way, Apt. 1016, Union, New Jersey 07083.

2. I am currently 28 years old, having been born on October 13, 1993.

3. I am the daughter of Joshua Olojo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic leiomyosarcoma on November 7, 2016. He was only 58 years old. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I were very close. I consider myself a "dad's girl." We would do everything together, like outdoors activities, gardening, hiking, soccer, and sometimes he'd come with me to the mall to go shopping. Our dad loved to take my brothers and me out to family dinners. He helped us with our school assignments, making sure that our math and English homework was alright. He really guided us growing up. During my college application

process, he helped me with everything. He did all my FAFSA forms and created all the accounts for me. I was kind of spoiled in that way. I always went to my dad for everything, like advice on school and relationships. My father was a very strong Christian man as well, so I would go to him with questions about my faith and life. I would ask him, “Why does the world work the way it does?” He knew everything. He was like a dictionary. When it came to questions about the real world, I would always go to my dad. When I was in college, I would call him multiple times a day.

6. I was about eight years old on 9/11/2001. I remember my mom hysterically rushing in to school to pick up my brothers and me early in the morning. I only remember the way my mom was crying. My father was working on the 87<sup>th</sup> Floor of the World Trade Center and finally returned home late in the evening. We didn’t know where he was for hours. Once my dad came home, our whole family celebrated. The whole day, we thought, there was no way he could’ve survived. I’m grateful that I got an extra fifteen years with my dad and that he didn’t die on that day, even though it was hard to watch him in pain and watch him deteriorate.

7. When my father was diagnosed with cancer, he didn’t tell us. He didn’t want to scare us. We really didn’t know the gravity of the situation until a month or two before he died. Because of our faith, we kept telling ourselves that God wouldn’t take him. I was telling myself that up until the end. He was a very healthy guy; he loved to hike and garden. We never thought he would have health problems. But I started to see his face hollowing out and that he was losing weight. Maybe around 2011, I started to realize how serious his health issues were. I know he had a tumor in his back, and only towards the end did I realize how much the cancer was spreading. He had a few surgeries, and every time he came home from the hospital, we would sleep in his room beside him to check in on him. I guess I didn’t understand how little time I had with my father.

8. When I was in college and learned that my dad’s cancer came back, I got scared. My dad always told us he would get better. It really did affect my schooling, and I wasn’t able to focus the way that I normally did. I always kept thinking about the worst-case scenario. I cried a lot. I’d go to college for a few months and come home for the holidays, and he’d look worse every time. My biggest goal was for him to see me graduate, so I just kept pushing. But it was a really hard time in my life. I went to the University of Maryland, and it took me about six

years to graduate. There were semesters when my dad couldn't pay for our school fees. He was so close to seeing me graduate—he passed away just a few months before my graduation. I couldn't even get out of bed after my dad died. But I was so close, and I finally did it.

9. I blocked out a lot out of my memory after my dad passed. I suppressed a lot of emotions just to push through. I was able to capture a video of my dad about a month before he passed. He's lying in the hospital, and you can see how sick and frail he looks. Even on the day of the video, he was still promising me that he was going to get better. And I believed him. I think he told me that because he wanted me to finish my degree. He always wanted the best for his kids. Every wedding that I've been to since my father passed, I can't even watch the brides and their fathers dancing. I regret not spending even more time with him when I could.

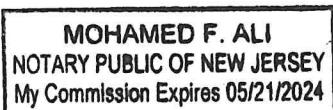


ABISOLA OLOJO

Sworn to before me this  
13<sup>th</sup> day of July, 2022



Notary Public



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

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1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3 Vermella Way, Apt. 1016, Union, New Jersey 07083.

2. I am currently 28 years old, having been born on October 13, 1993.

3. I am the daughter of Joshua Olojo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic leiomyosarcoma on November 7, 2016. He was only 58 years old. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I were very close. I consider myself a "dad's girl." We would do everything together, like outdoors activities, gardening, hiking, soccer, and sometimes he'd come with me to the mall to go shopping. Our dad loved to take my brothers and me out to family dinners. He helped us with our school assignments, making sure that our math and English homework was alright. He really guided us growing up. During my college application

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6. I was about eight years old on 9/11/2001. I remember my mom hysterically rushing in to school to pick up my brothers and me early in the morning. I only remember the way my mom was crying. My father was working on the 87<sup>th</sup> Floor of the World Trade Center and finally returned home late in the evening. We didn’t know where he was for hours. Once my dad came home, our whole family celebrated. The whole day, we thought, there was no way he could’ve survived. I’m grateful that I got an extra fifteen years with my dad and that he didn’t die on that day, even though it was hard to watch him in pain and watch him deteriorate.

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8. When I was in college and learned that my dad’s cancer came back, I got scared. My dad always told us he would get better. It really did affect my schooling, and I wasn’t able to focus the way that I normally did. I always kept thinking about the worst-case scenario. I cried a lot. I’d go to college for a few months and come home for the holidays, and he’d look worse every time. My biggest goal was for him to see me graduate, so I just kept pushing. But it was a really hard time in my life. I went to the University of Maryland, and it took me about six

years to graduate. There were semesters when my dad couldn't pay for our school fees. He was so close to seeing me graduate—he passed away just a few months before my graduation. I couldn't even get out of bed after my dad died. But I was so close, and I finally did it.

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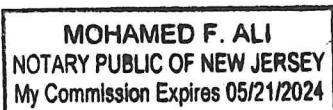


ABISOLA OLOJO

Sworn to before me this  
13<sup>th</sup> day of July, 2022



Notary Public



**Adedapo Olojo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

X

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
ADEDAPO OLOJO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

X

STATE OF NEW JERSEY )  
                          :  
COUNTY OF GLOUCESTER ) : SS.:

ADEDAPO OLOJO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1132 Monet Court, Williamstown New Jersey 08094.

2. I am currently 27 years old, having been born on March 8, 1995.

3. I am the son of Joshua Olojo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic leiomyosarcoma on November 7, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad was serious about education. He wanted to cultivate the habit of studying and reading in his children. He would take us to bookstores and the library. We used to go to sporting events and out to eat as a family. We really had the perfect family. My dad gave me life advice, guidance on my personal relationships, and advice on how to succeed in school. When I think about my father, I remember the most the advice he gave me.

6. On the morning of 9/11/2001, my father missed his morning train due to a soccer injury, so he couldn't get to the office as early as he usually did. Right when he entered his office at the World Trade Center, the first tower was hit by a plane. He and his coworkers evacuated the building, trying to escape from the dust and the fumes surrounding the area. My dad took shelter in a pizza restaurant. I was in daycare at the time, and my mom had to pick up my younger brother and me. No one could reach my dad at the time, and my mom was so scared. He came home later that day and was covered completely in dust and soot.

7. My junior and senior year of high school, I returned to Nigeria to complete my schooling. When I came back to the U.S. in June 2013, I saw a drastic change in my father's health. He looked completely different. My dad was the kind of person who didn't want to share negative things with his children. I started to notice that my older brother Ayodeji, my mother, and my sister would oftentimes take my dad to the hospital. This was pretty unusual, because my dad was a healthy guy. I noticed that he lost a lot of weight and that his eyebrows and hair were thinning. When we were in the car, sometimes my dad would fall asleep at the wheel. He was fatigued—I had never seen him so tired before. Whatever he was going through was taking a toll on his health.

8. When I came back to school from Nigeria, I went straight to college in Oklahoma. So, I didn't get to see my father in person a lot. My family would tell me about surgeries my dad had. For example, he had a tumor taken out of his waist. I remember coming home for one break, and my dad had a bag attached to his body with fluid coming out of it. My dad went through chemotherapy, and I was home during some of those times. It was hard watching him suffer through the treatments and learning that his cancer had come back a few months later.

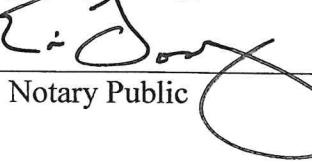
9. Because my father always wanted me to focus on school, I did my best to get good grades in college. It was going well the first two semesters, and I made the Dean's list. But my dad was getting more and more ill as time went on. I always thought I was a strong person mentally, but watching my dad suffer really started to get to me. When my father passed in 2016, I couldn't even complete my final exams. I had to take a break from school. Since then, it's been really hard for me to pick back up where I left off. I've tried to go back to school but it's not the same. I've been going on and off at college. At this point, I'd rather re-start my college career.

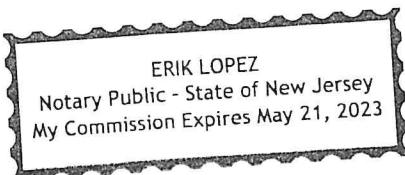
10. My family has struggled financially. We've had a hard time trying to pay tuition, and we were evicted from our original home. We're going through a lot as a family. That's why it's hard for me to complete school, since there's a financial aspect to it as well. I'm working on my bachelor's degree in Biology, and I want to go to medical school, but it's been hard for me to reach those goals.

11. When I'm home with my family, I always cry when we talk about my dad's stories. We all just break down when we think about the good times we had with our father. It's a wound that will never be healed, but I'll try to put a band-aid on it and move on with my life. My dad was an immigrant who came to the U.S. for his children to have a better life. My father always hid his troubles from his children. He wanted to see his children graduate and complete their degrees. Knowing that he never got to realize these dreams has been very hard for us. As the kids of immigrants, we want to have the satisfaction of our parents smiling upon us when we graduate. It hurts to know my dad won't be there for that. My father was a very able man, so to watch him deteriorate, really threw me off my course in life. I hope I can still make my father proud.

*Adedapo Oloj*  
ADEDAPO OLOJO

Sworn to before me this  
15<sup>th</sup> day of July, 2022

  
Notary Public



**Ibukunoluwa Olojo**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

In Re:

TERRORIST ATTACKS ON  
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AFFIDAVIT OF  
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Plaintiffs,

20-CV-00411 (GBD)(SN)

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ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW JERSEY )  
                          : SS.:  
COUNTY OF GLOUCESTER )

IBUKUNOLUWA OLOJO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1132 Monet Court, Williamstown New Jersey 08094.

2. I am currently 24 years old, having been born on September 19, 1997.

3. I am the son of Joshua Olojo, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic leiomyosarcoma on November 7, 2016, at the age of 58. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. I'm the youngest of the family, so I don't have a lot of experiences in adulthood with my father. Most of the time I spent with him was in my youth. I played football growing up, and my dad would always take me to practice. My dad is from Nigeria, so he didn't know as much about football in the United States at first. But he learned everything about it to support me as much as possible. My dad would always support me in school. He was very good at math,

and that was one of my weaknesses. My father told me, "The people who are doing better than you in class—are they any smarter than you? Or are they applying themselves more?" That advice sticks with me today. He was very encouraging, always there for me between my athletics and schoolwork. My dad would say to me, "Education is the one thing no one can take away from you."

6. I don't remember a lot of what happened on 9/11/2001, since I was only three years old at the time. I remember that my mother was very scared.

7. My father didn't actually tell me he had cancer until the very, very end. But looking back on it, I picked up on signs that my dad was sick. In 2015-2016, I found out my dad had cancer, but he did a lot to hide it. He was a very stoic man—he didn't want to show his family that he was battling with illness. My dad would just say, "I'm going for a checkup," whenever he went to a doctor's appointment.

8. Even when my dad went in for surgery, my parents would keep it under wraps. When I asked what the surgery was for, my parents would only give me a surface-level answer. But I noticed physical changes in my father. He was sick for a very long time, probably about a decade before he passed. He was always in and out of the hospital. I saw him lose hair and lose a lot of weight.

9. Emotionally, it was hard. My dad used to travel and take lots of pictures. When I would see the pictures from when he was ill versus the few years prior, I really noticed a difference. That took a toll on me—I knew something wasn't right. We traveled as a family and once were on a plane, and he was coughing heavily. People were looking at him. I felt shame... everyone was looking at him or trying to move away from him. I didn't like seeing him be a target of ridicule.

10. Financially, my father's illness had a huge impact on our family's lives. I remember overhearing a phone conversation between my parents in 2011, probably around the time my dad first started to get really sick. I heard them talking about retirement. I thought to myself, "Why would my dad be retiring?" But I didn't realize his early retirement was due to his cancer. That's when my mom started to work two jobs. Then, there were no more Christmas gifts. I used to go to the Friends School (private Quaker school), but I had to transfer to public school because my parents couldn't pay the tuition anymore. That was heartbreakingly for my dad

because he cared so much about education. My mom used to buy me clothes at Hollister or Abercrombie. When my dad became sick, we had to start buying clothes at clearance stores. We were also evicted from our home—the house I grew up in. I remember the sheriff knocking on our door and handing my mother the eviction papers. Going out of and coming into my own home, seeing an eviction notice on the door, it really hurt.

11. I was only 19 when my dad passed away. My dad was too weak to even attend my high school graduation. He couldn't be there for my college orientation at Kean University, only my mother could come. His only goal was to put us through school, and he couldn't even see that wish fulfilled. I had to leave after one semester because I wasn't able to pay tuition. I wish I could have finished college. I got a job at FedEx instead, for \$17/hour.

12. My father was my leader in life. He was showing me the right path in life. Now that my father is gone, I don't have that male figure telling me what to do. You really don't understand what it's like to not have a father until you're in that position. I realize there's a real necessity for a father in the household, especially to show his sons the right way in life. How to carry myself as a man, how to dress, how to speak—my father isn't here to teach me any of these things. I'm in "Gen Z," and now I look online for guidance because I don't have that male figure in my life anymore.

13. Watching my father in the hospital with tubes attached to him looked like he wasn't even the same person. In the days prior to his death, he already looked deceased. When my brother Ayodeji was married recently, it was a bittersweet moment because our father wasn't there. I was crying on the way to the ceremony, because it reminded me that my father would never see me become a man. I wasn't a man at 19 years old when my father died. My father isn't here to see me be the person I'm becoming.



IBUKUNOLUWA OLOJO

Sworn to before me this  
10 day of July, 2022



Notary Public

BROOKE FRALICK  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01FR6396128  
Qualified in Oswego County 23  
Commission Expires August 12, 2023

**Aaron Shawn Graeb**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
AARON SHAWN GRAEB**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF ALABAMA      )  
                              : SS.:  
COUNTY OF MOBILE      )

AARON SHAWN GRAEB, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3431 Summer Woods Drive, Mobile, Alabama 36695.

2. I am currently 51 years old, having been born on May 17, 1971.

3. I am the son of Larry Ordell Rappe, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pulmonary fibrosis on October 21, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and mother divorced when I was very young, so I didn't have much of a relationship with my father until my teen years. Once I turned sixteen, I would spend the summer with him each year. We re-connected during those years. I went to college in Florida

and stayed with him, and that's when I really got to know him. I look a lot like my dad. The more we were together, especially when I lived close by to him, our relationship grew. We went on a cruise together and did lots of father-son activities. Seven years ago, I decided to move back to Alabama to be closer to my family, and six months after I moved there, my dad was diagnosed with pulmonary fibrosis.

6. We didn't sit down and talk about his experience at the World Trade Center. My dad was working for a disaster relief company as a counselor. When I re-connected with my dad, we wanted to catch up on everything we lost throughout those years. We didn't want to focus on anything negative, like his experience at Ground Zero. I was focused on forming a father-son bond with my dad.

7. In 2015, my dad called me and asked me to meet him at his home. When I met him, he told me he was diagnosed with pulmonary fibrosis, and that it was a result of his exposure at Ground Zero. From there, I started to do research on my own. It was hard to learn of his diagnosis because we had just been reunited, and we were trying to get back everything that we didn't have all those years.

8. After my dad's diagnosis, I spent as much time with him as I could. We would spend time together during the weekdays even though I worked. We'd spend hours just talking and everything, even when I had to wake up early for work the next morning. I took him for many doctors' visits and spent a lot of time in the hospital with him. My wife actually worked in the hospital he was at. Any time he had a doctor's appointment, I would call in sick to work so I could go with him. I took a week off work to go on a cruise with him too. Anytime he needed me, I would be there. Toward the end, when he was getting really bad, I wanted to make sure I spent quality time with him.

9. Watching my father go through what he went through was probably the hardest part of this whole experience. It's hard knowing that he went down to Ground Zero to help people, but that's the reason he got sick. I think back about when he was getting worse and worse each day—it makes me angry and sad at the same time. It was very difficult watching him go through the stages of illness. I still think about him all the time. It's rough. Anytime I go back to the house and talk to my brother or sister or Paula about it, it brings everything back.

10. My father was very well known in the veteran community. He had a great impact on veterans' lives. It's just amazing. He helped get a grant for RVs so that veterans could take trips across the country. He was an incredibly selfless man.



Aaron Shawn Graeb

Sworn to before me this  
11 day of July, 2022

Desire Henline  
Notary Public

